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File Number: 0008334-00037

May 15, 2025

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VIA ECF

The Honorable P. Kevin Castel
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Advanced Flower Capital Inc., et al. v. Michael Kanovitz , et al.*
Case No. 1:25-CV-02996

Dear Judge Castel:

We represent Plaintiffs Advanced Flower Capital Inc. and AFC Agent LLC in the above-captioned matter. We write to inform the Court that we oppose Defendants' request to stay this case pending resolution of Defendants' proposed motion to transfer under 28 U.S.C. § 1404(a) to a district in which they caused companies they control to bring a *subsequent* litigation against Plaintiffs here. (ECF No. 11.) Among other reasons, resolution of Defendants' motion to dismiss under federal law should not be affected by the federal court deciding it, and the discovery would be necessary in either jurisdiction. There is no basis to prejudice Plaintiffs—who served their complaint on Defendants more than a month ago—with further delay. Defendants will submit their official response to Defendants' letter by Monday, May 19, in accordance with Rule 3(A)(iii) of Your Honor's Individual Practices.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Bill Martin', with a long horizontal flourish extending to the right.

Bill Martin